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15 Attorneys for Keri B. Howard and Rodney Lee
16 Baggett

17 UNITED STATES BANKRUPTCY COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 In re
20 PG&E Corporation,
21 and
22 PACIFIC GAS AND ELECTRIC
COMPANY,
23 Debtors.

24 [] Affects PG&E Corporation
25 [] Affects Pacific Gas and Electric Company
[x] Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11
Lead Case, Jointly Administered

**DECLARATION OF JOHN N. DEMAS IN
SUPPORT OF MOTION PURSUANT TO
FED. R. BANKR. P. 9006(b)(1) TO
ENLARGE THE TIME FOR
HOWARD/BAGGETT TO FILE PROOFS
OF CLAIM**

Date: April 7, 2020
Time: 10:00 a.m.
Crtrm.: Courtroom 17
450 Golden Gate Avenue
San Francisco, CA 94102
Judge: Hon. Dennis Montali

Objection deadline: March 31, 2020
4:00 p.m. (Pacific Time)

I, John N. Demas, hereby declare as follows:

1. I am an attorney at law duly licensed to practice before the Courts of the State of California, and am the owner of Demas Law Group, P.C.

1 2. I represent wildfire victims who sustained losses from the North Bay Fires in 2017
2 and the Camp Fire in 2018. I have timely filed over 225 Proof of Claim forms with Prime Clerk
3 for losses clients have suffered as a result of these fires.

4 3. On February 25, 2020, Keri Howard called my office and left a message requesting
5 an update on her case. Ms. Howard's name and contact information did not appear in our case
6 management system and she did not appear to be a client of ours. My office researched the claim
7 forms filed with Prime Clerk and did not find a filed Proof of Claim for Ms. Howard. To further
8 investigate Ms. Howard's inquiry, all lawyers who worked on the wildfire cases searched their
9 electronic files and no one found any communications with Ms. Howard or information to indicate
10 she was a current client.

11 4. During the Fall of 2019, a law clerk named Cory Culver worked at my office and
12 assisted lawyers on the wildfire cases. To further investigate Ms. Howard's call, Ms. Culver's
13 email inbox was searched on February 25, 2020 for Ms. Howard's name and three emails were
14 discovered.

15 5. On September 25, 2019 at 9:41am, Ms. Culver sent an email to Ms. Howard with
16 an intake questionnaire and a fee agreement attached. Attached hereto as Exhibit A is a copy of the
17 September 25, 2019 email.

18 6. On September 30, 2019 at 8:38am, Ms. Howard responded to Ms. Culver's
19 September 25th email attaching photographs of a completed intake questionnaire and a signed fee
20 agreement for herself and a Rod Lee Baggett. Attached hereto as Exhibit B is a copy of the
21 September 30, 2019 email.

22 7. On September 30, 2019, soon after Ms. Howard's email was received by Ms.
23 Culver, Ms. Culver responded to Ms. Howard that she had received the documents. Attached
24 hereto as Exhibit C is a copy of the September 30, 2019 email.

25 8. Despite receiving the intake questionnaire, Ms. Culver did not forward Ms.
26 Howard's email or documents to anyone, as per our standard operating practice. This prevented
27 Ms. Howard's information from being input into our case management system and a file was
28 never opened for her or Mr. Baggett.

1 9. The October 21, 2019 and the extended December 31, 2019 Bar Date Deadlines
2 passed and because Ms. Howard and Mr. Baggett were never formally identified as clients, no
3 Proof of Claim forms were filed on their behalf.

4 10. Ms. Culver moved to San Diego and her last day at my firm was January 3, 2020.

5 11. On February 28, 2020, I called Ms. Howard and explained that no Proof of Claim
6 form had been filed on her or Mr. Baggett's behalf but that one would be filed that day and all
7 steps available and necessary would be taken to attempt to remedy the administrative error.

8 12. On February 28, 2020, Proof of Claim forms were filed for the losses sustained by
9 Ms. Howard and Mr. Baggett as a result of the North Bay wildfires.

10 13. I am over eighteen years of age, of sound mind, and fully-competent to make this
11 declaration. All statements in this declaration are based on my own personal knowledge and
12 observation and from my review of the court and business records in this case, or upon
13 information and belief as indicated. If called to testify on this matter, I can and would competently
14 testify to the matters set forth in this Declaration.

I declare under penalty of perjury pursuant to the laws of the United States of America that
the foregoing is true and correct.

17 Executed this 12 day of March, 2020, in Sacramento, California.

By: JOHN N. DEMAS

EXHIBIT A

From: Cory Culver
To: Meghan Palu
Subject: Fw: PG&E Fire Case Documents
Date: Friday, February 28, 2020 4:31:46 PM
Attachments: Fee agreement fire cases with FG.pdf
Intake Questionnaire.docx

From: Cory Culver
Sent: Wednesday, September 25, 2019 9:41 AM
To: keribea@aol.com <keribea@aol.com>
Subject: PG&E Fire Case Documents

Hi Keri,

I apologize for not reaching out sooner. Please find attached our fee agreement and an intake questionnaire. I hope I am correct in assuming you were in the North Bay fires, I know you had mentioned your referral was one of our North Bay clients. If I am incorrect, please let me know and I will send you a set of forms that is for the right fire. Sorry for the lack of clarity on my part!

Please let me know if you have any questions. Thank you!

Cory Culver
530-636-9000

EXHIBIT B

From: [Cory Culver](#)
To: [Meghan Palu](#)
Subject: Fw: PG&E fire case documents
Date: Friday, February 28, 2020 4:33:45 PM

From: Cory Culver
Sent: Monday, September 30, 2019 9:15 AM
To: Keri Howard <keribe@comcast.net>
Subject: Re: PG&E fire case documents

Hi Keri,

I got them!!

Cory

[Get Outlook for Android](#)

From: Keri Howard <keribe@comcast.net>
Sent: Monday, September 30, 2019 8:38:25 AM
To: Cory Culver <Cory@demaslawgroup.com>
Subject: PG&E fire case documents

Hi Cory.....Hopefully these come through. Please let me know.

Thanks
Keri Howard
707-889-0471

EXHIBIT C

From: Cory Culver
To: Meghan Palu
Subject: Fw: PG&E fire case documents
Date: Friday, February 28, 2020 4:33:45 PM

From: Cory Culver
Sent: Monday, September 30, 2019 9:15 AM
To: Keri Howard <keribe@[aol.com](#)>
Subject: Re: PG&E fire case documents

Hi Keri,

I got them!!

Cory

[Get Outlook for Android](#)

From: Keri Howard <keribe@[aol.com](#)>
Sent: Monday, September 30, 2019 8:38:25 AM
To: Cory Culver <Cory@[demaslawgroup.com](#)>
Subject: PG&E fire case documents

Hi Cory.....Hopefully these come through. Please let me know.

Thanks
Keri Howard
707-889-0471